

JOINT TRIAL WITNESS ESTIMATE FORM

CASE NO. 18-CV-5838-DSF (JPR) *Lockett v. County of Los Angeles, et al.*

TRIAL DATE: 12/14/21

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
1.	Abellano, Aaron	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
2.	Aceituno, Jose	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				East Los Angeles Sheriff's Substation.	
3.	Aguilera, Elizabeth	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
4.	Aiya, Deputy	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
5.	Alcala, Jonathan	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
6.	Aldama, Samuel	P 3.0	3.0	Defendant Aldama is anticipated to testify regarding all issues in this case including but not limited	Defendants Objection to Plaintiff's Anticipated subject matter of testimony of

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X-EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				to his interactions with plaintiff, his reporting, his membership in the Executioners, his racial animus towards Black people, the investigation into his prior actions and testimony in the <i>Taylor v. County of Los Angeles</i> case, his false statements under oath surrounding Deputy Orrego's DUI arrest, and his spousal/domestic partner battery	Aldama as FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
7.	Avalos, Deputy	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
8.	Aviles, D.	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
9.	Banuelos, Thomas	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X-EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
10.	Barajas, Edwin	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
11.	Baray, Deputy	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
12.	Barnes-Proby, Dionne	P 1.0	1.0	Co-author of the Rand study "Understanding Subgroups Within the Los Angeles County Sheriff's Department: Community and Department Perceptions with Recommendations for Change"; anticipated to testify regarding the Rand study, its contents, and recommendations	Note: only one of the co-authors will be testifying; all co-authors are listed as the testifying witness has not yet been identified
13.	Barragan, Frank	P .25	.25	Sheriff Sergeant identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
14.	Battles, David	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
15.	Bautista, Anthony	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
16.	Benzor, Rogelio	P 1.0	1.0	Interaction with witness Imunique Ross and Executioners	Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
17.	Beserra, P.	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
18.	Blasnek, Chris	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
19.	Bouskill, Kathryn	P 1.0	1.0	Co-author of the Rand study "Understanding Subgroups Within the Los Angeles County Sheriff's Department: Community	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				and Department Perceptions with Recommendations for Change”; anticipated to testify regarding the Rand study, its contents, and recommendations	
20.	Burnett, Bryan	P 1.50	1.0	P retained gunshot residue expert	Defendants’ Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
21.	Campbell, Eboni	P .50	.50	Alleged victim listed on the incident report and friend of plaintiff’s	Note: only one of the co-authors will be testifying; all co-authors are listed as the testifying witness has not yet been identified Defendants’ Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
22.	Campbell, Gary	P .25	.25	Alleged victim listed on the incident report and friend of plaintiff’s	Defendants’ Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
23.	Campbell, Keana	P .25	.25	Alleged victim listed on the incident report and friend of plaintiff’s	Defendants’ Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
24.	Campbell, Timothy	P .75	.75	Alleged victim listed on the incident report and friend of plaintiff’s	Defendants’ Objections: FRE 403 more prejudicial than probative; FRE 402

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
					Irrelevant; Mr. Campbell failed to appear for the second portion of his deposition and Defendants are filing a motion in limine to exclude his testimony based on his failure to complete his deposition.
25.	Carbajal, Luis	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
26.	Casas, David	P .50	.50	One of the plaintiffs in Hernandez, et al. v. County of Los Angeles, et al.; anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X-EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
27.	Castro, Mario	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
28.	Chapman, Scott	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
29.	Chavez, Ernie	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X-EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	
30.	Choi, Vincent	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
31.	Chow, Jeff	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				Aldama after his transfer to the East Los Angeles Sheriff's Substation.	
32.	Clark, LaTonya	P .25	.25	Sheriff Captain identified by Deputy Austreberto Gonzales as a victim of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
33.	Clark, Roger	P 2.0	1.5	P police practices and Sheriff gang expert	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
34.	Cole, Tremayne	P .25	.25	Alleged victim listed on the incident report	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
35.	Contrera, Eugene	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
36.	Cooley- Strickland, M.E.d., Ph.D. Michele	P 2.0	1.5	P expert psychologist	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 702 Dr. Cooley Strickland's opinions are inadmissible under Daubert.
37.	Cortez, Rebecca	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation	
38.	Covarrubias, O.	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
39.	Cuvas, Deputy	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
40.	Davila, Deputy	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
41.	Davis, Clyde	P 1.0	.50	P's mother's husband. Anticipated to testify regarding P's work and schedule as well as P's injuries and damages	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; lacks foundation as to Plaintiff's work schedule; best evidence; Duplicative of

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
					testimony of Plaintiffs' Employer witness # 123 and Michell Davis witness # 43.
42.	Davis, Lois	P 1.0	.75	Co-author of the Rand study "Understanding Subgroups Within the Los Angeles County Sheriff's Department: Community and Department Perceptions with Recommendations for Change"; anticipated to testify regarding the Rand study, its contents, and recommendations	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
43.	Davis, Michelle	P 1.0	.75	P's mother. Anticipated to testify regarding P's work and schedule as well as P's injuries and damages as well as the search of her home by the Sheriffs	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; Duplicate testimony of Clyde Davis (witness #41) Superior Grocers PMK (witness #123)
44.	Del Castillo, C.	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
45.	Denham, Bobby	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	
46.	Easter, Anthony	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
47.	Eisen, PhD. Mitchell	P 1.0	.75	P's witness identification expert	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
48.	Elizondo, Mark	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	
49.	Embleton, Austin	P 1.0	1.0	Deputy Sheriff involved in P's apprehension	
50.	Escobedo, Oscar	P .50	.50	One of the plaintiffs in Hernandez, et al. v. County of Los Angeles, et al.; anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
51.	Estrada, Angelica	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
52.	Estrada, S.	P .25	.25	Sheriff Deputy identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
53.	Feria, Carlos	P 1.0	1.0	Deputy Sheriff involved with P's apprehension	
54.	Frias, Michael	P .50	.50	Investigator for P's counsel in the underlying criminal case	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
55.	Gabler, Motti	P 1.0	.75	P cell phone extraction expert	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
56.	Garcia, Adrian	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
57.	Garcia, Ed	P 1.0	.75	P forensic statistician	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
58.	Garcia, Silvano	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X-EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	
59.	Garrido, Lt.	P 2.0	2.0	Sheriff Lieutenant anticipated to testify about the Executioners gang; deputies who are members of the Executioners; deputies who are prospects to become members of the executioners; actions taken by the inked members of the Executioners; actions taken by prospects to become members of the Executioners; the knowledge of superiors and ranking members within the Sheriff's Department as to the Executioners; the "ghost gun" process; how a member becomes "inked"; how a prospect "chases ink"; how the Executioners were running the Compton station	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
60.	Gomez, Eric	P .35	.35	Detective involved in preparing the incident report involving plaintiff	

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
61.	Gonzalez, Alfred	P .50	.50	One of the plaintiffs in Hernandez, et al. v. County of Los Angeles, et al.; anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
62.	Gonzalez, Austreberto	P 1.5	1.25	Whistleblower Deputy Sheriff re: Executioners gang. He is anticipated to testify about deputies who are members of the Executioners; deputies who are prospects to become members of the executioners: actions taken by the inked members of the Executioners; actions taken by prospects to become members of the Executioners; the knowledge of superiors and ranking members within the Sheriff's Department as to the Executioners; the "ghost gun" process; how a member becomes "inked"; how a prospect "chases ink"; how the Executioners were running the Compton station	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X-EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
63.	Goodwin, Brian	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant FRE 404 Improper Character Evidence
64.	Granados, Louis	P .50	.50	One of the plaintiffs in Hernandez, et al. v. County of Los Angeles, et al.; anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
65.	Guzman, Gabriel	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
66.	Guzman, Javier	P 2.0	1.0	Deputy Sheriff who filed a claim for damages relating to the Executioners gang; anticipated to testify about deputies who are members of the Executioners;	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				deputies who are prospects to become members of the executioners; actions taken by the inked members of the Executioners; actions taken by prospects to become members of the Executioners; the knowledge of superiors and ranking members within the Sheriff's Department as to the Executioners; the "ghost gun" process; how a member becomes "inked"; how a prospect "chases ink"; how the Executioners were running the Compton station	
67.	Hamil, Jeff	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
68.	Hanamaki, Nikki	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
69.	Harris, Deputy	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
70.	Harrison, Dawyn	P .50	.50	Supervisor of Alexandra Zuiderweg, who was the author of the letter from County of Los Angeles, Office of the County Counsel 8/19/21 re "Request for Legal Opinion Regarding Policy to Prohibit Sheriff's Department Employees from Participating in Subgroups." She is anticipated to testify regarding the legal analysis set forth in the document	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				as well as the approval and ratification of the contents of the document by the County of Los Angeles	
71.	Hernandez, Deputy	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
72.	Hernandez, Art	P .50	.50	One of the plaintiffs in Hernandez, et al. v. County of Los Angeles, et al.; anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
73.	Hernandez, Michael	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
74.	Huntsman, Max	P 2.0	1.5	Inspector General Huntsman is anticipated to testify about all issues relating to sheriff clique gangs in the Los Angeles County Sheriff's Department and the Inspector General's investigation and the Sheriff's actions relating to sheriff clique gangs.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
75.	Hutak, Jodie	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
76.	Jaeger, William	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	
77.	Jimenez, R.	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
78.	Jimenez, Sergio	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
79.	Johnson, Myron	P .50	.50	Captain at Compton Sheriff's Station	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
80.	Juarez, Jaime	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
81.	Kennedy, Sean	P 1.0	.75	Mr. Kennedy had prepared the Memo, dated April 2, 2010, addressed to the ADHOC Committee on deputy cliques/secret societies for the Los Angeles County Sheriff's	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				Civilian Oversight Commission. Mr. Kennedy is anticipated to testify regarding his research and analysis, and the actions taken by the Los Angeles County Sheriff's Department relating to the "deputy cliques/secret societies" issues.	
82.	Kim, Woodrow	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
83.	Kirkwood, Jr. Craig	P 1.0	.75	Mr. Kirkwood was the public defender assigned to plaintiff Lockett's underlying criminal action. He is anticipated to testify regarding all events relating to the criminal case	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
84.	Krase, J.	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
85.	Kraut, Michael	P 1.0	.75	P expert on the DA filing/prosecution process	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 702 opinions are inadmissible under Daubert.
86.	Kuhl, Sheila	P 1.0	.75	Supervisor Kuehl is a member of the Los Angeles County Board of Supervisors and was the co-author of the Motion "Assessing County Liability in Settlements Involving Sheriff 'Gangs'". She is anticipated to testify regarding Sheriff "cliques", clique tattoos, the efforts by the Board of Supervisors to try to address these issues and the Sheriff Department's responses.	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
87.	Leamon, Isabel	P 1.0	.75	Co-author of the Rand study "Understanding Subgroups Within the Los Angeles County Sheriff's Department: Community	Note: only one of the co-authors will be testifying; all co-authors are listed as the

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				and Department Perceptions with Recommendations for Change”; anticipated to testify regarding the Rand study, its contents, and recommendations	testifying witness has not yet been identified
88.	Lemus, Ariela	P .50	.50	One of the plaintiffs in Hernandez, et al. v. County of Los Angeles, et al.; anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff’s Department.	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
89.	Leos, Andy	P .25	.25	Sheriff Sergeant identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
90.	Lockett, Sheldon	P 2.0	1.75	Plaintiff to testify about the incident and his damages	
91.	Lopez, Noel	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff’s Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff’s Department, including ongoing activity by defendant Samuel Aldama after his transfer to the	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				East Los Angeles Sheriff's Substation.	
92.	Maldonado, Albert	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
93.	Martinez, I.	P .25	.25	Deputy Sheriff involved in preparing the incident report involving plaintiff	
94.	Mejia, Richard	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				East Los Angeles Sheriff's Substation.	
95.	Mendoza, Joe	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
96.	Mendoza, Raymond	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
97.	Mendoza-Graf, Alexandra	P 1.0	.75	Co-author of the Rand study "Understanding Subgroups	Note: only one of the co-authors will be testifying; all

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				Within the Los Angeles County Sheriff's Department: Community and Department Perceptions with Recommendations for Change"; anticipated to testify regarding the Rand study, its contents, and recommendations	co-authors are listed as the testifying witness has not yet been identified Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
98.	Mizel, Matthew	P 1.0	.75	Co-author of the Rand study "Understanding Subgroups Within the Los Angeles County Sheriff's Department: Community and Department Perceptions with Recommendations for Change"; anticipated to testify regarding the Rand study, its contents, and recommendations	Note: only one of the co-authors will be testifying; all co-authors are listed as the testifying witness has not yet been identified Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
99.	Moffett, Mark	P 1.0	.75	Deputy Moffett was a deputy sheriff at the Compton station and is anticipated to testify as to the clique/gang activity and racist activity at the station	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
100.	Moore, Christopher	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X-EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	
101.	Moran, Joanna	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
102.	Moran, Vincent	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				East Los Angeles Sheriff's Substation.	
103.	Muniz, Eduardo	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
104.	Munoz, Rafael	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
105.	Murakami, Tim	P .50	.50	Undersheriff Murakami is employed with the Sheriff's Dept. and is alleged to have been part of the ongoing racist culture in the Sheriff's Department. He is anticipated to testify as to racial issues within the department and correspondingly the public.	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
106.	Navarro, Manny	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
107.	O'Linn, Mildred	P .50	.50	Attorney of record in James v. County of Los Angeles, et al., and was one of the attorneys involved in filing "Defendants' Objections to and Motion to Strike Plaintiff's Motion in Limine to Exclude Reference to	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				the Regulators; Memorandum of Points and Authorities in Opposition.” She is anticipated to testify regarding the factual admissions and the basis for judicial estoppel on the admissions set forth in said motion, as well as the approval and ratification of the contents of said motion by the County of Los Angeles.	
108.	Orrego, Mizrain	P 2.0	1.5	Former defendant anticipated to testify about the incident and the Executioners	
109.	Ortega, Marcelo	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
110.	Ortiz, Miguel	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
111.	Pacheco, Anthony	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
112.	Palacios, Manual	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	
113.	Palombi, Joanana	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
114.	Palomino, Nicole	P .25	.25	Sheriff Lieutenant identified by Deputy Austreberto Gonzales as a victim of the Executioners gang	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
115.	Parga, Carlos	P .50	.50	Lt. Parga is employed with the Sheriff's Department and is alleged to have been the victim of the ongoing racist culture in the Sheriff's Department. He is	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				anticipated to testify as to racial issues within the department and correspondingly the public.	
116.	Parra, Eldemira	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
117.	Partida, Pablo	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
118.	Paxton, Darnell	P .25	.25	Alleged victim listed on the incident report	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
119.	Perez, Chris	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
120.	Perez, Claudia	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants Objection: FRE 403 more prejudicial than probative; FRE 402 Irrelevant

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
121.	Perez, Nikolis	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant
122.	Peterson, Samuel	P 1.0	.75	Co-author of the Rand study "Understanding Subgroups Within the Los Angeles County Sheriff's Department: Community and Department Perceptions with Recommendations for Change"; anticipated to testify regarding the Rand study, its contents, and recommendations	Note: only one of the co-authors will be testifying; all co-authors are listed as the testifying witness has not yet been identified Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.
123.	PMK from Superior Grocers	P .50	.50	P's employer to testify regarding P's employment and hours worked on the date of the incident	Defendants' Objections: FRE 402 Irrelevant.

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
124.	Porowsky, Kelly	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.
125.	Ramos, Hugo	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.
126.	Reynaga, Hugo	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	
127.	Rivera, Anthony	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.
128.	Robledo, Braulio	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				Aldama after his transfer to the East Los Angeles Sheriff's Substation.	
129.	Rodriguez, Gregory	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.
130.	Rojas, Jonathan	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
131.	Rosario, Erin	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.
132.	Ross, Imunique	P .75	.75	Eyewitness to the drive by shooting. Anticipated to testify regarding events surrounding Lockett identification	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.
133.	Ross, LaQuisha	P .25	.25	Alleged victim listed on the incident report	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.
134.	Ross, Yumise	P .25	.25	Alleged victim listed on the incident report	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.
135.	Ruiz Aguilar, D.	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as	Defendants' Objections: FRE 403 more prejudicial than

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				a member/prospect of the Executioners gang	probative; FRE 402 Irrelevant.
136.	Ruiz, Steven	P .25	.25	Sheriff Lieutenant identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.
137.	Saavedra, Hector	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
138.	Saldana, O	P .25	.25	Sheriff Deputy identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.
139.	Sanchez, Juan	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	
140.	Sanchez, Leo	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
141.	Sanchez, Soraya	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				East Los Angeles Sheriff's Substation.	
142.	Sandoval, Jesus	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.
143.	Sandoval-Mendoza, J.	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.
144.	Santos, Jessica	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
145.	Schumaker, K.	P .50	.50	Deputy Sheriff's involved in preparing the incident report involving plaintiff	
146.	Self, Deputy	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as	Defendants' Objections: FRE 403 more prejudicial than

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				a member/prospect of the Executioners gang	probative; FRE 402 Irrelevant.
147.	Sepulveda, Karla	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
148.	Shinn, Charles	P 1.5	1.0	P's tattoo expert	
149.	Silverio, David	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
150.	Smitson, Eric	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
151.	Snoke, Joshua	P 1.0	.75	Co-author of the Rand study "Understanding Subgroups Within the Los Angeles County Sheriff's Department: Community and Department Perceptions with Recommendations for Change"; anticipated to testify regarding the Rand study, its contents, and recommendations	Note: only one of the co-authors will be testifying; all co-authors are listed as the testifying witness has not yet been identified
152.	Solis, Hilda	P 1.0	.75	Supervisor Solis is a member of the Los Angeles County Board of Supervisors and was the co-author of the Motion "Assessing County Liability in Settlements Involving Sheriff 'Gangs.'" She is	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				anticipated to testify regarding Sheriff "cliques," clique tattoos, the efforts by the Board of Supervisors to try to address these issues and the Sheriff Department's responses.	
153.	Soria, John	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
154.	Stewart, Tracy	P .50	.50	Lt. Stewart is employed with the Sheriff's Department and is alleged to have been the victim of the ongoing racist culture in the Sheriff's Department. She is anticipated to testify as to racial issues within the department and correspondingly the public	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
155.	Strawn, Matt	P 1.0	.75	Co-author of the Rand study "Understanding Subgroups Within the Los Angeles County Sheriff's Department: Community and Department Perceptions with Recommendations for Change"; anticipated to testify regarding the Rand study, its contents, and recommendations	Note: only one of the co- authors will be testifying; all co-authors are listed as the testifying witness has not yet been identified Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.
156.	Sum, David	P .50	.50	Lieutenant at Compton Sheriff's station	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.
157.	Tardy, April	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
158.	Thatcher, Michael	P 1.0	.75	Commander at Compton Sheriff's Station	Note: only one of the co- authors will be testifying; all co-authors are listed as the testifying witness has not yet been identified Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.
159.	Toone, Andy	P 1.0	.75	Deputy Toone was a deputy sheriff at the Compton station and is anticipated to testify as to the clique/gang activity and racist activity at the station. According to a news report published on April 6 2021, the Executioners were founded by former 2000 Boy Deputy Toone.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.
160.	Torres, Edmundo	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X-EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	
161.	Valiente, Wanda	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a victim of the Executioners gang	Note: only one of the co-authors will be testifying; all co-authors are listed as the testifying witness has not yet been identified Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.
162.	Valle, Luis	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
163.	Vargas, Iliana	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.
164.	Vasquez, Deputy	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Note: only one of the co-authors will be testifying; all co-authors are listed as the testifying witness has not yet been identified Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.
165.	Vega, Deputy	P .25	.25	Deputy Sheriff identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.
166.	Villa, Andrea	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X-EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				Aldama after his transfer to the East Los Angeles Sheriff's Substation.	
167.	Villalobos, Deputy	P .25	.25	Deputy Sheriff involved in preparing the incident report involving plaintiff	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence; Cumulative there are multiple Deputies testifying on this topic.
168.	Villanueva, Alex	P 3.0	2.0	The Los Angeles County Sheriff. He is anticipated to testify regarding the Sheriff Department's knowledge about the Executioners; the Sheriff Department's ratification of the Executioners existence and actions; the investigation into the racial animus disclosed by Defendant Aldama at his deposition; the investigation into the Executioners; the bases for his public comments that the Executioners do not exist; and all	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				other general issues going to the Monell cause of action	
169.	Wargo, John	P .25	.25	Sheriff Lieutenant identified by Deputy Austreberto Gonzales as a member/prospect of the Executioners gang	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
170.	Weidmer, Beverly	P 1.0	.75	Co-author of the Rand study "Understanding Subgroups Within the Los Angeles County Sheriff's Department: Community and Department Perceptions with Recommendations for Change"; anticipated to testify regarding the Rand study, its contents, and recommendations	Note: only one of the co-authors will be testifying; all co-authors are listed as the testifying witness has not yet been identified Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
171.	Williams, Brian	P 1.0	.75	Mr. Williams is the Executive Director of the Los Angeles County Civilian Oversight Commission. He is anticipated to testify regarding Sheriff "cliques", clique tattoos, the efforts by the Oversight Commission to try to address	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				these issues and the Sheriff Department's responses.	
172.	Williams, Lissa	P .25	.25	Alleged victim listed on the incident report	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant.
173.	Wolack, James	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
174.	Wong, Sr. Kenton	P .50	.50	Forensic scientist involved in preparing the incident report involving plaintiff	Note: only one of the co- authors will be testifying; all co-authors are listed as the testifying witness has not yet been identified Defendants' Objections: FRE 403 more prejudicial than

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X-EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
					probative; FRE 402 Irrelevant.
175.	Woodward, Diana	P .25	.25	Identified as a member of the Banditos Gang within the Sheriff's Department. Anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department, including ongoing activity by defendant Samuel Aldama after his transfer to the East Los Angeles Sheriff's Substation.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
176.	Zaredini, Benjamin	P .50	.50	One of the plaintiffs in Hernandez, et al. v. County of Los Angeles, et al.; anticipated to testify as to ongoing clique/gang activity and racist activity within the Sheriff's Department.	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
177.	Zuiderweg, Alexandra	P .50	.50	As the author of the letter from County of Los Angeles, Office of the County Counsel 8/19/21 re "Request for Legal Opinion Regarding Policy to Prohibit Sheriff's Department Employees from Participating in Subgroups,"	Note: only one of the co-authors will be testifying; all co-authors are listed as the testifying witness has not yet been identified

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				she is anticipated to testify regarding the legal analysis set forth in the document as well as the approval and ratification of the contents of the document by the County of Los Angeles	Defendants' Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
178.	Dr. Reading	D 1.5	1.0	Defendants' Psychologist	
179.	Clarence Chapman	D 1.5	2.0	Defendants' Police Practices	
180.	Mr. Zengler	D 1.0	.50	Defendants Forensic Economist	Plaintiff's Objection: subject of Plaintiff's Motion in Limine to exclude
181.	Det. Jerry Saba	D. .50	.50	Will testify regarding the process and methodology of cell phone extraction as well as the data extracted from Plaintiff's cell phone.	
182.	Det. Eduardo Flores	D. .50	.50	Will testify regarding the term "noco"	Plaintiff's Objections: FRE 403 more prejudicial than probative; FRE 402 Irrelevant; FRE 404 Improper Character Evidence
183.	Krristina Fritz	D 1.5	1.0	Will testify regarding her methodology and analysis of the gunshot residue kit collected	

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				from Plaintiff, her conclusions and findings.	
184.	Jeronimo Casasola	D 1.5	1.0	Defendants' tattoo expert	
185.	Neal Tyler	D 2.0	2.0	Will testify regarding his research and knowledge of deputy cliques and tattoos.	
186.	Capt. William Jaeger	D 2.0	2.0	Internal Affairs – will testify regarding Deputy Subgroups and COLA/LASD's investigation into the existence and behavior of groups.	
187.	Dr. Chun Joey Chang	D .75	.50	Will testify regarding Plaintiff's presentation at Coast Plaza Hospital, communications with Plaintiff, examination, testing care, diagnosis, medical condition, future prognosis, and treatment, assessment of Plaintiff and his medical condition at Coast Plaza Hospital after the incident.	
188.	Marlon A. Estrella R.N.	D .50	.50	Will testify regarding the assessment and treatment provided to Plaintiff by Nurse Estrella at Coast Hospital after	

NO.	WITNESS NAME	PARTY CALLING WITNESS AND ESTIMATE	X- EXAMINER'S ESTIMATE	DESCRIPTION OF TESTIMONY	COMMENTS
				the subject incident, any monitoring and Plaintiff's refusal of medication.	
189.	Dr. Atul Patel	D .75	.50	Will testify regarding his review and interpretation of the CT scan of the Plaintiff's cervical spine that was done on January 15, 2016.	
190.	Dr. Nicholas Keuhn	D .75	.50	Will testify regarding his review and interpretation of the CT Scan of the plaintiff's head after the incident and Dr. Keuhn's review and interpretation of plaintiff's chest/rib x-ray that was done on January 15, 2016.	
191.	Dr. Alfred Joshua	D 1.5	1.0	Will testify regarding Lockett's alleged injuries, causation, prognosis/future treatment and damages from incident.	
	TOTAL ESTIMATES	108.35	202.7		